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14 UBER TECHNOLOGIES, INC.  
and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,  
19 Plaintiff,  
20 v.  
21 UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING LLC,  
22 Defendant.  
23  
24

Case No. 3:17-cv-00939-WHA

**DECLARATION OF ESTHER KIM  
CHANG IN SUPPORT OF  
DEFENDANTS UBER  
TECHNOLOGIES, INC. AND  
OTTOMOTTO LLC'S  
IDENTIFICATION OF MOTIONS IN  
LIMINE FOR RESOLUTION PRIOR  
TO TRIAL**

Judge: The Honorable William Alsup

Trial Date: October 10, 2017

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1 I, Esther Kim Chang, declare as follows:

2 1. I am an attorney with the law firm of Morrison & Foerster LLP. I am a member in  
3 good standing of the Bar of the State of California. I make this declaration based on personal  
4 knowledge and, if called as a witness, I could and would testify competently to the matters set  
5 forth herein. I make this declaration in support of Defendants Uber Technologies, Inc. and  
6 Ottomotto LLC's Identification of Motions in Limine for Resolution Prior to Trial.

7 2. Attached hereto as Exhibit 1 is a true and correct copy of an employment offer  
8 letter from 280 Systems, Inc. to Anthony Levandowski, dated January 28, 2016. This document  
9 was produced during the course of discovery with Bates number UBER00011726-11729.

10 3. Attached hereto as Exhibit 2 is a true and correct copy of an employment offer  
11 letter from 280 Systems, Inc. to Claire Delauney, dated February 11, 2016. This document was  
12 produced during the course of discovery with Bates number UBER00045442-45445.

13 4. Attached hereto as Exhibit 3 is a true and correct copy of Uber  
14 Technologies, Inc.'s 2013 Equity Incentive Plan, Notice of Restricted Stock Award, dated  
15 February 11, 2016, issued to Claire Delaunay. This document was produced during the course of  
16 discovery with Bates number UBER00023106-23122.

17 5. Attached hereto as Exhibit 4 is a true and correct copy of an employment offer  
18 letter from 280 Systems, Inc. to Rhian Morgan, dated January 15, 2016. This document was  
19 produced during the course of discovery with Bates number UBER00045537-45540.

20 6. Attached hereto as Exhibit 5 is a true and correct copy of Uber  
21 Technologies, Inc.'s 2013 Equity Incentive Plan, Notice of Restricted Stock Award, dated  
22 January 15, 2016, issued to Rhian Morgan. This document was produced during the course of  
23 discovery with Bates number UBER00023523-23539.

24 7. Attached hereto as Exhibit 6 is a true and correct copy of Uber  
25 Technologies, Inc.'s 2013 Equity Incentive Plan, Notice of Restricted Stock Award, dated  
26 January 28, 2016, issued to Anthony Levandowski. This document was produced during the  
27 course of discovery with Bates number UBER00016410-16428.

8. Attached hereto as Exhibit 7 is a true and correct copy of an e-mail exchange between Rudy Kim and Uber personnel, with the most recent e-mail dated February 13, 2016. This document was produced during the course of discovery with Bates number UBER00017265-17276.

9. Attached hereto as Exhibit 8 is a true and correct copy of an e-mail exchange between Arturo Gonzalez and Jordan Jaffe, with the most recent e-mail dated April 8, 2017.

10. Attached hereto as Exhibit 9 is a true and correct copy of relevant pages from the deposition of Asheem Linaval, taken on April 13, 2017.

11. Attached hereto as Exhibit 10 is a true and correct copy of an e-mail from Arturo Gonzalez to plaintiff's counsel, dated April 16, 2017.

12. Attached hereto as Exhibit 11 is a true and correct copy of an e-mail exchange between Arturo Gonzalez and Jordan Jaffe, with the most recent e-mail dated April 18, 2017.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 10th day of July, 2017, in San Francisco, California.

/s/ Esther Kim Chang

ESTHER KIM CHANG

## ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. González, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Esther Kim Chang has concurred in this filing.

Dated: July 10, 2017

/s/ Arturo J. González

ARTURO J. GONZÁLEZ